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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,

Debtors.¹**

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**[PROPOSED] STIPULATION AND AGREED ORDER WITHDRAWING THE
DEBTORS' AND AD HOC GROUP OF INDIVIDUAL VICTIMS' FIRST SET OF
REQUESTS FOR PRODUCTION OF DOCUMENTS TO PETER W. JACKSON**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

This Stipulation and Agreed Order (the “**Stipulation and Order**”) is entered into by and among: (i) Purdue Pharma L.P. and its affiliated debtors in the above-captioned chapter 11 cases (collectively, “**Debtors**”); (ii) the Ad Hoc Group of Individual Victims (the “**Personal Injury Ad Hoc Group**”); and (iii) Peter W. Jackson (together with the Debtors and the Personal Injury Ad Hoc Group, the “**Parties**” and each a “**Party**”).

WHEREAS, on June 2, 2021, the Debtors filed the Sixth Plan Supplement Pursuant to the Fifth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and Its Affiliated Debtors (the “**Plan Supplement**”) [Dkt. No. 2977];

WHEREAS, on June 3, 2021, the Debtors filed the Fifth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and Its Affiliated Debtors (the “**Plan**”) [Dkt. No. 2982] and the Disclosure Statement for Fifth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and Its Affiliated Debtors (the “**Disclosure Statement**,” together with the Plan and Plan Supplement, the “**Current Plan Materials**”) [Dkt. No. 2983];

WHEREAS, on June 3, 2021, the Court issued an order [Dkt. No. 2988] approving the adequacy of the information in the Disclosure Statement and permitting the Debtors to begin solicitation of the Plan;

WHEREAS, on June 4, 2021, the Debtors and the Personal Injury Ad Hoc Group served the First Set of Requests for Production of Documents to Peter W. Jackson (the “**RFPs**”) on Peter W. Jackson through his undersigned counsel;

WHEREAS, on June 15, 2021, Peter W. Jackson, through his undersigned counsel, served responses and objections to the RFPs on the Debtors and the Personal Injury Ad Hoc Group;

WHEREAS, on June 24, 2021, and June 28, 2021, the Parties met and conferred regarding the RFPs;

WHEREAS, on June 24, 2021, during the meet and confer teleconference among the Parties, Peter W. Jackson, through his undersigned counsel, represented that, except as set forth below, he does not intend to object on any basis to the Plan or Plan Supplement as reflected in the Current Plan Materials;

WHEREAS, on June 28, 2021, during the meet and confer teleconference among the Parties, Peter W. Jackson, through his undersigned counsel, represented that Mr. Jackson has not commenced, and has no intention to commence, any legal proceeding against any Released Party² or any Shareholder Released Party;

NOW, THEREFORE, the following is hereby stipulated and agreed to by the Parties, subject to the approval of the Court:

1. Peter W. Jackson, through his undersigned counsel, hereby represents that he will not object to confirmation of the Plan or any aspect of the Plan as reflected in the Current Plan Materials, including, without limitation, any of the Plan Settlement, the Shareholder Settlement, the Non-NAS PI TDP, and the releases set forth in Article X in the Plan, provided, however, that Peter W. Jackson reserves the right to object to the Plan: (i) if the Plan is amended or changed in any material manner; (ii) if any report of the examiner appointed pursuant to the Order Appointing an Examiner Pursuant to 11 U.S.C. § 1104(c) dated June 21, 2021 [Dkt. No. 3048] includes any finding that the Special Committee of the Debtors' Board of Directors did not act independently or acted under the direction or influence of the Sackler Families with respect to the Shareholder

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Plan.

Settlement reflected in the Debtors' Fifth Amended Joint Chapter 11 Plan of Reorganization [ECF No. 2982]; and/or (iii) solely on the legal ground that the Shareholder Releases violate applicable law.

2. The Debtors and the Personal Injury Ad Hoc Group hereby withdraw the RFPs including, without limitation, any further obligation to respond to the RFPs.

3. In the event that Peter W. Jackson files an objection to confirmation of the Plan, the Debtors and Personal Injury Ad Hoc Group reserve all rights to renew the RFPs and/or to seek any other relief.

IN WITNESS WHEREOF, the Parties have executed this Stipulation and Order as of the date set forth below.

Dated: June 30, 2021
New York, New York

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*Co-Counsel for Ad Hoc Group of
Individual Victims of Purdue Pharma
L.P., et al.*

SO ORDERED.

Dated: June __, 2021
White Plains, New York

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THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE